

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:94CR00056 JCH
	)	
JEROME WILLIAMS,	)	
	)	
Defendant.	)	

**GOVERNMENT'S MOTION TO CONTINUE RE-SENTENCING HEARING**

COMES NOW the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Dean R. Hoag, Assistant United States Attorney for said District, and respectfully requests a two-week continuance of the re-sentencing hearing for defendant Williams scheduled to commence on May 11, 2015, until a date thereafter which is convenient to the Court and the parties.

The re-sentencing hearing for defendant Williams is currently scheduled for Monday, May 11, 2015, at 9:30 a.m.

The undersigned counsel for the Government had a total knee replacement surgery done on April 14, 2015, which has required him to be out of the office on extended medical leave since that date. The undersigned is tentatively scheduled to return to work (on a part-time basis) on May 11, 2015. However, due to his leave, Government's counsel has been unable to receive and/or review documents filed by defense counsel, and therefore, unable to prepare responses. Defense counsel has recently filed a sentencing memorandum which may require a response from the Government. The undersigned would like to request a two-week continuance of the re-sentencing hearing to

allow him time to review the sentencing memorandum and other reports filed, and to prepare and file any necessary response.

The undersigned's legal assistant has spoken with defendant Williams' attorney, Beverly Beimdieck, who has no objections to the Government's request to continue the re-sentencing hearing. Additionally, counsel for both parties would like to advise the Court that should the Court grant this motion to continue, they would both be available on the morning of Thursday, May 21, 2015.

WHEREFORE, the Government respectfully requests a two-week continuance of the re-sentencing hearing for defendant Williams scheduled to commence on May 11, 2015, until a date thereafter which is convenient to the Court and the parties.

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

s/ Dean R. Hoag  
DEAN R. HOAG, #23843MO  
Assistant United States Attorney  
111 South 10th Street, Room 20.333  
St. Louis, MO 63102  
(314) 539-6895

**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Beverly Beimdieck  
Asst. Federal Public Defender  
(Attorney for defendant Williams).

s/ Dean R. Hoag  
DEAN R. HOAG, #23843MO  
Assistant United States Attorney